

United States Courts
Southern District of Texas
FILED

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

July 14, 2020

for the

David J. Bradley, Clerk of Court

Southern District of Texas

United States of America

v.

Richard Reyes Trigo,
Date of birth 12/07/1985Case No. **3:20-mj-102**

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 14, 2020 in the county of Brazoria in the
Southern District of Texas, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 USC § 2251(a)(e)	Production of Child Pornography
18 USC § 2252A(a)(2)(b)(1)	Distribution of Child Pornography

This criminal complaint is based on these facts:

See attached Affidavit of probable cause.

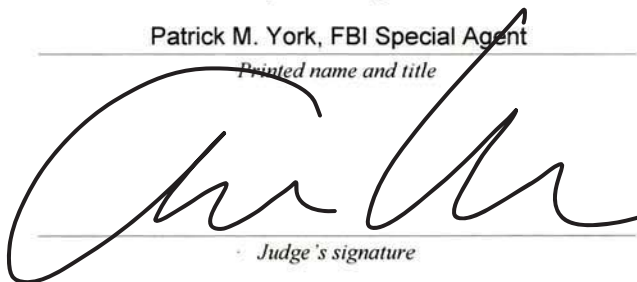
☒ Continued on the attached sheet.

Complainant's signature

Patrick M. York, FBI Special Agent

Printed name and title

Sworn to before me telephonically.

Date: 07/14/2020City and state: Houston, Texas

Judge's signature

Andrew M. Edison, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Patrick M. York, being duly sworn, depose and state:

1. I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI) currently assigned to the Houston Division Texas City Residence Agency (TCRA) investigating violent crime matters, which includes crimes against children. I have been a Special Agent of the FBI since February 2009. While in the FBI, I have been assigned to a violent crime squad investigating and assisting with investigations of gangs, drugs, fugitives, crimes against children, and crimes in Indian Country, which include sexual assaults, aggravated assaults, and homicides. Prior to the FBI, I was a Texas Peace Officer for over twelve years. Since April 2018, I have been assigned to the Houston Division TCRA and responsible for investigating multiple criminal violations. My investigations have included criminal violations relating to child exploitation and child pornography including the illegal production, distribution, receipt and possession of child pornography, in violation of Title 18 U.S.C. §§ 2251(a)(e) and 2252A(a)(2)(b)(1) et seq.
2. I have received training in the areas of child exploitation, child pornography, and have also discussed the subject matter with other experienced SA's and Law Enforcement Officers (LEO's). I have also had the opportunity to observe and review several examples of child pornography in all forms of media, to include computer media.
3. Child Pornography, as defined in Title 18 U.S.C. § 2256, is:
"any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where – (A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; . . . [or] (C) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct." For conduct occurring after April 30, 2003, the definition also includes "(B) such visual depiction is a digital image, computer image, or computer-generated image that is, or is indistinguishable from that of a minor engaging in sexually explicit conduct."
4. This Affidavit is made in support of a criminal complaint charging Richard Reyes TRIGO with violating Title 18 U.S.C. §§ 2251(a)(e) and 2252A(a)(2)(b)(1) et seq.
5. I am familiar with the information contained in this Affidavit based upon the investigation conducted by SAs and Task Force Officers (TFOs) of the FBI's Washington Field Office (WFO) and the Texas City FBI Office. I have personally conducted conversations with other law enforcement officers involved in this investigation, or who have engaged in numerous investigations involving child pornography.
6. Because this Affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation, I have set forth only those facts that I believe are necessary to establish probable cause that evidence of a violation of Title 18 U.S.C. § 2251(a) & (e) has been

committed by Richard Reyes TRIGO on or about July 13, 2020. Where statements of others are set forth in this Affidavit, they are set forth in substance and in part.

7. On Monday July 13, 2020, a FBI Washington Field Office (WFO) Task Force Officer, was acting in an undercover (UC) capacity as part of the Metropolitan Police Department-Federal Bureau of Investigation ("MPD-FBI") Child Exploitation Task Force, operating out of a satellite office in Washington, D.C. In that capacity, the UC posted an online bulletin message on a specific social media forum known to the UC as a website where users meet to discuss and trade child pornography and child erotica among other things. This site is forum based and offers users an internal email in which they can communicate with other users. Users can start a conversation thread and title the topic for all users to view. Users can respond to the thread for all users to see.
8. On July 4, 2020, the UC posted an advertisement on this site. This advertisement was refreshed on Friday, July 10, 2020. The advertisement read, "33 yo dad into very dark taboo, looking for other younger moms/dads into same." The UC added his KIK¹ account name to the advertisement.
9. On July 13, 2020, the UC received a private KIK message from a KIK user using the screen name, "joe12joe126969" with a display name of, "Joe Jen". This user was subsequently identified as Richard Reyes TRIGO. During the course of the chat TRIGO identified himself as a 36 year-old male residing in Texas. TRIGO informed the UC that he was married and had purported daughters of ages 2 and 9. During the course of the chat TRIGO made the following comments regarding his kids, "Love spying on them when they are in the shower". "I want to get a spy cam in the house."
10. During the course of the chat TRIGO stated that he was sexually active with his purported 2 year-old daughter. TRIGO stated that he has performed oral sex on her vagina and anus and has rubbed his penis on her body. TRIGO further stated, "Yes love to cum on their feet even get a little on my finger and put it to mouth" During the course of the chat TRIGO informed the UC that he had, "pussy pics" of his purported 2 year-old daughter who he later described as being 1 and a half. During the course of the chat the UC informed TRIGO that he was sexually active with his purported 8 year-old daughter. The UC sent TRIGO a clothed image of his purported daughter (not a real child)². TRIGO sent the UC an image of his purported daughter's bare vagina. The picture is a close up shot of what appears to be a toddler's vagina. A males hand is seen touching the toddlers inner thigh.
11. During the course of the chat TRIGO stated that he met a friend that resides close to him in Texas. TRIGO stated that he has invited this friend over and allowed him to have sexual contact with his purported daughter. TRIGO stated he invites him over when he knows that

¹ KIK is an instant messaging mobile application where one can transmit and receive messages, photos, and videos. Users can communicate privately with other users or in groups.

² The images the UC sent to TRIGO did not depict a real child.

his wife will be out of the house. During the course of the chat TRIGO stated that he was at work and informed the UC that he would be home at 6pm. TRIGO stated, "Love to show you live pics of her."

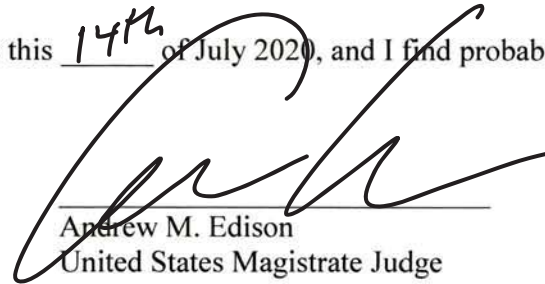
12. On July 13, 2020, at approximately 8:08pm EST TRIGO sent the UC a live camera image of a toddler child. The image depicted the toddler's buttocks from the side and she appeared to be on her knees. A light purple shirt can be seen on the toddler. The UC asked TRIGO if he could hold up 3 fingers near the toddlers head in an attempt to ascertain if TRIGO had immediate access to a real kid. TRIGO complied and sent the UC an image of himself holding up 3 fingers near his child's head. The child is wearing the same purple shirt as described above.
13. During the course of the chat TRIGO stated that he took his purported child's diaper off and was "playing" with her. TRIGO stated that he was rubbing his penis on his child's vagina and was licking her vagina and anus. TRIGO sent the UC a live camera image of his daughter's bare vagina. The focus of the image is on the child's bare vagina. A male has his fingers on her thigh. The same purple shirt can be seen on the child as described above.
14. On Tuesday July 14, 2020, the UC continued to communicate with TRIGO. TRIGO sent the UC an image of his purported wife. The picture was that of a clothed Hispanic female. During the course of the chat the UC asked TRIGO about the friend that he allows access to his daughter. TRIGO stated, "He plays with my youngest. He puts his dick to her mouth."
15. An emergency disclosure form was submitted to Kik c/o MediaLab requesting subscriber identification and IP logs associated with username joe12joe126969. Kik's response provided display name "Joe Jen", unconfirmed email address remjoe735@gmail.com, device description Samsung android SM-N950U, and IP logs spanning June 15, 2020 through July 14, 2020. Examination of the IP logs yielded a combination of AT&T Wireless, T-Mobile Wireless, and Hughes Network IP addresses.
16. An administrative subpoena was served on Hughes Network requesting subscriber identification and service address information associated with IP address 67.44.192.96 Port 34078 on June 30, 2020 at 18:53:20 UTC. This was the only non-wireless IP address in the logs provided by Kik. Hughes' response identified the subscriber as Maria Fuentes, with a service address of 1507 Airline Court, Rosharon TX 77583.
17. Upon receipt of this information, FBI Washington used available open source (e.g., Google, Facebook), commercial (e.g., Accurant), and law enforcement sensitive (e.g., NCIC, Texas DMV) databases to fully identify the suspected user of Kik account joe12joe126969 as Richard Reyes TRIGO (DOB: 12/07/1985). TRIGO has no identifiable criminal history. His wife was identified as Ericka Genev Villarreal. Social networking profiles were identified as belonging to TRIGO (www.facebook.com/richard.trigo.7) and Villarreal (www.facebook.com/ericka.villarreal.39). A Driver's license photo of Villarreal matched the image that Trigo sent the UC of his wife. Publicly available photographs on Villarreal's profile provide an images of minor female relatives that appears to match the same age as the child depicted in the illicit photos that Trigo sent the UC.

18. Based on his training and experience, your Affiant believes that the aforementioned sexually explicit images are in fact child pornography, as defined in Title 18, U.S.C. § 2256.



Patrick M. York
Special Agent
Federal Bureau of Investigation

Subscribed and sworn before me telephonically this 14th of July 2020, and I find probable cause.



Andrew M. Edison
United States Magistrate Judge